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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

CASE NO.: 24-44478-MXM-13

**DEBORAH DENISE REED
120 SADDLE RIDGE DR
GODLEY, TX 76044
SSN/TIN: XXX-XX-7536**

**PAUL ERVIN REED JR
120 SADDLE RIDGE DR
GODLEY, TX 76044
SSN/TIN: XXX-XX-5941**

DEBTORS

HEARING: APRIL 17, 2025 AT 8:30 AM

TRUSTEE'S AMENDED OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Amended Objection to Confirmation. Trustee would respectfully show the Court:

In addition to the grounds alleged in the previous objection, which are incorporated herein by reference, the Trustee objects to confirmation for the following reason(s):

The Plan fails the feasibility test of Section 1325 (a)(6) because Debtors' Plan provides for the following plan payments:
TO THE TRUSTEE THE SUM OF \$500.00 PER MONTH FOR THE FIRST 2 MONTHS; \$1,500.00 PER MONTH FOR THE NEXT 5 MONTHS; \$3,500.00 PER MONTH FOR THE NEXT 52 MONTHS; \$59,000.00 PER MONTH FOR THE FINAL MONTH FOR A TOTAL OF \$249,500.00 IN 60 MONTHS.

Debtors' monthly surplus per Schedules I and J is \$3,500.02.

Debtors have not filed all applicable federal, state, and local tax returns as required by Sections 1308 & 1325 (a)(9). Tax return(s) for the following tax year(s) have not been filed: 2021.

Debtors have not provided a complete and redacted copy of the federal income tax return(s) most recently due to the Internal Revenue Service as required by Sections 521(e) & 1325(a)(1).

The Plan does not meet the requirements of the Bankruptcy Code and should not be confirmed for the following reasons:
DEBTOR'S PLAN CONTAINS NONSTANDARD LANGUAGE THAT IS UNCLEAR AND MAY VIOLATE LIEN PRIORITY RULES.

The following creditors were not listed on a Certificate of Service filed with the Plan and/or Authorization for Adequate Protection Disbursements:

ALL PROOF OF CLAIM NOTICING ADDRESSES AND NOTICE OF APPEARANCE PARTIES

The Plan violates the conduit provisions of the the Standing Order Concerning All Chapter 13 Cases. The Debtors are sufficiently delinquent to a Mortgage Lender and are required to file a Plan that provides for an appropriate number of ongoing monthly mortgage payments and cures mortgage arrears through the Conduit Program.

WHEREFORE, Trustee prays that confirmation be DENIED and for general relief.

Respectfully submitted,
By: /s/ Ethan S. Cartwright
Ethan S. Cartwright, Staff Attorney
Bar No. 24068273
PAM BASSEL STANDING CHAPTER 13 TRUSTEE
Bar No. 01344800
860 Airport Freeway, Ste 150
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(817) 916-4710 Phone

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtors' attorney and all parties entitled to electronic notice and by first class mail on the Debtors and the parties listed below, if any.

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright

DEBORAH DENISE REED
PAUL ERVIN REED JR
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GODLEY, TX 76044